TAI PARK

1140 Avenue of the Americas, 17th Fl New York, NY 10036

> (212) 301-7632 tai@taiparklaw.com

July 25, 2023

VIA ECF

Hon. Lewis J. Liman United States District Judge United States Courthouse 500 Pearl Street New York, N.Y. 10007 REOUEST GRANTED.

The Court approves the bail modification for Michael Shvartsman and Gerald Shvartsman as proposed. Item 11 is modified to read "The defendants shall not make any individual financial transfers in excess of \$25,000 without the approval of Pretrial Services or the United States Attorney's Office for the Southern District of New York."

Re: United States v. Shvartsman, et. al., 23 Cr. 307 (LJL)

7/26/2023 SO ORDERED.

LEWS J. LIMAN

Dear Judge Liman:

On behalf of defendants Michael and Gerald Shvartsman in the above-referenced case, we write to request a modification of the bail terms entered by the Court on July 21, 2023, see ECF Doc. No. 8 ("the Bail Order"). Specifically, item 11 in the order provides in pertinent part: "The defendants shall not make any individual financial transfers in excess of \$5,000 without the approval of Pretrial Services or the United States Attorney's Office for the Southern District of New York." The defendants request that the order be modified to permit transfers up to \$25,000 rather than "\$5,000," without the approval of Pretrial Services or the U.S. Attorney's Office. As the defendants have ongoing and recurring expenses that regularly exceed \$5,000, including, for example, mortgage payments and home renovation construction costs, it has proven time-consuming and inefficient to seek approval for each such cost.

Accordingly, we respectfully request that item 11 of the order be modified to replace the figure "\$5,000" with "\$25,000." We have consulted with Assistant U.S. Attorney Nicholas Roos, and the government does not oppose this application.

Respectfully,

Tai H. Park

cc: All counsel of record via ECF